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Prosequendum of the Estate of Jose Rosalio Vargas-Garcia
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

AA JEDSON COMPANY, LLC,
Debtor.

Chapter 7 Case

Case No.: 24-22898 (SHL)

**NOTICE OF MOTION PURSUANT TO 11 U.S.C. §362(d)
FOR RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that on **May 7, 2025, at 10:00 a.m.**, or soon thereafter as counsel may be heard, the undersigned attorneys for Patricia Jimenez, as Administrator ad Prosequendum of the Estate of Jose Rosalio Vargas-Garcia (“Jimenez”), a creditor and party-in-interest in the above case, will move before the Honorable Sean H. Lane, U.S.B.J., at the United States Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, for entry of an order: (i) granting relief from the automatic stay to allow Jimenez to continue certain pre-petition civil litigation against third party insurance proceeds; and (ii) granting such further and different relief to Jimenez as the Court deems just and proper in the circumstances (“Motion for Relief”).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Motion for Relief shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and Local Rules of the Bankruptcy Court, and shall be filed with the Clerk of the Bankruptcy Court and served upon, among other parties, Falcon Rappaport & Berkman LLP, the attorneys for Jimenez, Attn: Michael Moskowitz, Esq., so as to be filed, served, and actually received, by no later than **April 30, 2025 at 4:00 p.m.** (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that you may appear at the hearing in person, by phone or by videoconference. You must register for the Hearing through the eCourt Appearance Tool by no later than 4:00 p.m. (ET) one business day before the hearing. Failure to register by the specified deadline will result in the participant not being admitted to the hearing. Parties are strictly forbidden from circulating or sharing the Zoom link.

PLEASE TAKE FURTHER NOTICE that if a hearing on the Motion for Relief cannot be held within thirty (30) days, Jimenez waives the requirement for holding a hearing within thirty (30) days of filing the Motion for Relief and agrees to a hearing on the earliest possible date. Jimenez consents to the automatic stay remaining in effect until the Court orders otherwise.

Dated: Rockville Centre, New York
April 14, 2025

FALCON RAPPAPORT & BERKMAN LLP
Attorneys for Patricia Jimenez, as Administrator ad
Prosequendum of the Estate of
Jose Rosalio Vargas-Garcia

By: /s/ Michael L. Moskowitz
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